

EXHIBIT B

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1 UNITED STATES DISTRICT COURT

2 FOR THE EASTERN DISTRICT OF VIRGINIA

3 CASE NO.: 2:18cv530

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5 CSX TRANSPORTATION, INC.,
individually and on behalf of
NORFOLK & PORTSMOUTH BELT LINE
RAILROAD COMPANY,

6
7 Plaintiff,

8 vs.

9 NORFOLK SOUTHERN RAILWAY
COMPANY, et al.,

10 Defendants.

11 _____ /

12
13 TRANSCRIPT DESIGNATED UNDER PROTECTIVE ORDER

14 VIDEOTAPED DEPOSITION OF

15 ROBERT GIRARDOT

16 Tuesday, January 12, 2021
9:36 a.m. - 6:37 p.m.
17 Remote Proceedings

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24 Stenographically Reported By:
Gina Rodriguez, RPR, CRR, CCP
25 Job No. CS4385284

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2 Q. Mr. Girardot, how often do you communicate
3 with steamship line customers?

4 A. Directly, you know -- you know, I mean, you
5 know -- I'd say -- you know, I'd say I talk to a
6 steamship line -- actually directly to a steamship
7 line customer, you know, on average, you know, maybe
8 once a week.

9 You know, but -- but indirectly, you know,
10 in -- or together with, you know, our -- our sales
11 team, all the time, you know, frequently.

12 Q. Okay.

13 A. You know, I'm not the direct contact.

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16 Did you participate in a conversation with
17 NPBL representatives to reach that understanding?

18 A. I remember being on a conference call
19 with -- with the NPBL representatives, and in our --

20 Q. And who do you remember -- I'm sorry, I
21 didn't mean to cut you off. But who do you remember
22 from the NPBL that was on that call, sir?

23 A. You know, I was a supporting player on the
24 call. I didn't really -- you know, I don't remember
25 who was on the other side.

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1 Q. Did you introduce yourself as an attendee
2 of that call, sir?

3 A. I was on the call invite list. I know
4 that.

5 Q. Yeah. My question was: Did you introduce
6 yourself as an attendee of that call?

7 A. I'm sure I did, yes.

8 Q. Do you remember the date of the call?

9 A. No.

10 Q. Was there a calendar invitation sent for
11 that call?

12 A. I'm -- I'm sure there was, yeah.

13 Q. You mentioned in your earlier testimony
14 that there were various notes from that call.

15 Did you personally take notes?

16 A. No, I did not.

17 Q. So you don't have anything that you
18 recorded that would allow you to refresh your
19 recollection of that call?

20 A. No.

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